

Appendix B.11 to the NIBW Consent Decree

**STATEMENT OF WORK FOR JOINT REMEDIAL ACTION AND OPERATION &
MAINTENANCE (UPPER ALLUVIAL UNIT GROUND-WATER REMEDY)**

INTRODUCTION

This Statement of Work (SOW) requires the Settling Defendants for the Joint Work to implement a remedy for Upper Alluvial Unit (UAU) ground-water contamination at the North Indian Bend Wash (NIBW) Superfund site in accordance with the ROD. The purpose of the work described in this SOW is to monitor the mass and mass flux of VOCs in UAU ground water and the fate of the VOC mass leaving the UAU and entering the Middle Alluvial Unit (MAU) and Lower Alluvial Unit (LAU). Based on the results of the work completed under this SOW, EPA may require additional ground-water monitoring wells and/or additional ground-water monitoring.

The Settling Defendants shall install ground-water monitoring wells, monitor ground-water quality and ground-water elevations in a network of existing and new UAU and MAU monitoring wells, and report the results to EPA, with a copy to the State. The Settling Defendants shall perform the work in accordance with:

- o the ROD,
- o this SOW, and
- o the requirements of the Consent Decree.

The Settling Defendants shall furnish all personnel, materials, and services needed, or incidental to, performing the work described in this SOW, except as otherwise specified in the Consent Decree. EPA will oversee all work required by this SOW. In accordance with Section VII ("Additional Response Actions") of the Consent Decree, EPA may require Settling Defendants to perform additional work to attain the Performance Standards.

In order to fulfill the requirements of this Consent Decree, the Settling Defendants shall implement the following tasks:

1. DEVELOPMENT OF THE UAU GROUND-WATER REMEDY FIELD SAMPLE PLAN, QUALITY ASSURANCE PROJECT PLAN, AND HEALTH AND SAFETY PLAN

Within fifteen (15) days of the effective date of the Consent Decree, the Settling Defendants shall submit for EPA approval, with a copy to the State, a Field Sample Plan (FSP), a Quality Assurance Project Plan (QAPP) and a Health and Safety Plan (HSP) for the activities described in this SOW. The FSP, QAPP and HSP shall pertain specifically to the activities required under this SOW; however, the Settling Defendants may rely upon existing plans developed for NIBW, to the extent deemed appropriate by EPA. (The following documents include an

assortment of field sampling techniques, analytical methods, and associated quality assurance/quality control techniques that have been used at NIBW to date: the Quality Assurance Project Plan, Indian Bend Wash and Phoenix-Litchfield Airport Area Sites (EPA, November, 1984); the Groundwater Field Sampling Plan - Phase II/Stage 2 Remedial Investigation for the NIBW site (EPA, December, 1987); the Field and Laboratory Operations Plan (SRP, January, 1990); the North Indian Bend Wash Sampling and Analysis Plan (SRP, June, 1991); and the North Indian Bend Wash Quality Assurance Project Plan (SRP, June, 1991).) The Settling Defendants also shall incorporate into the FSP and the QAPP any necessary protocols and analytical methods that have not been included in existing plans for NIBW. The Settling Defendants shall not commence any portion of the field work until EPA has approved the FSP and the QAPP for that portion of the field work.

The Settling Defendants shall prepare the QAPP and FSP to ensure that well installation, sample collection, sample handling, analytical activities and water-level measurements are conducted in accordance with technically acceptable protocols, and to ensure that the data are useful for monitoring the mass and mass flux of VOCs in and leaving the UAU.

a. Field Sample Plan (FSP)

The Settling Defendants shall prepare the FSP in accordance with the USEPA Region 9 guidance for Preparation of a Sampling and Analysis Plan for Private and State-Lead Superfund Projects (April, 1990). The Settling Defendants shall describe in detail the installation and data gathering methods that will be used during the well installation and monitoring programs. The Settling Defendants shall include in the FSP descriptions of installation objectives, drilling methods, materials and depth intervals, surface completions, sampling objectives, sampling locations, sampling equipment and procedures, sample handling and analysis, decontamination, and disposal of investigation-derived wastes.

The Settling Defendants shall describe in the FSP the sampling and analysis methods, shall identify no less than twenty-eight (28) existing UAU monitoring wells to be included in the monitoring program and shall reference, where appropriate, relevant sections of the QAPP. The Settling Defendants shall provide for analysis of samples by gas chromatography. The Settling Defendants shall maintain detection limits for VOCs of 0.5 micrograms per liter of water solution. The Settling Defendants shall maintain water-level measurement accuracy (including measurement of the measuring point elevation) of 0.01 foot. At a minimum, the Settling Defendants shall provide for blank and duplicate analyses as part of the QA/QC program described in the FSP and QAPP.

The Settling Defendants also shall present in the FSP the schedule for all field activities and reporting of sample analyses.

Field logbooks used by the Defendants shall record observations during the well installation program, flow rates during sampling, volume purged and rationale for that volume, and any unusual conditions at the time of sampling.

b. Quality Assurance Project Plan (QAPP)

The Settling Defendants shall prepare the QAPP in accordance with the USEPA Region 9 Guidance for Preparing Quality Assurance Project Plans For Superfund Remedial Projects (September, 1989). In the QAPP, the Settling Defendants shall describe the Data Quality Objectives (DQOs) and organization, functional activities, data reduction, validation, reporting and personnel qualifications for the work described in this SOW.

The Settling Defendants shall demonstrate, to EPA's satisfaction, that each laboratory it uses is qualified to conduct the proposed work. This includes qualifications to use methods and analytical protocols for the chemicals of concern in the media of interest within detection and quantification limits consistent with both QA/QC procedures and DQOs approved in the QAPP for this SOW.

The Settling Defendants shall select a laboratory that has and follows an approved QA program. If the Settling Defendants select a laboratory that is not in EPA's Contract Laboratory Program (CLP), the selected laboratory shall use methods consistent with CLP methods that would be used at this site for the purposes proposed and QA/QC procedures approved by EPA. If the laboratory is not in the CLP program and is not currently approved by EPA for work at NIBW, prior to utilizing the analytical services of the laboratory, the Settling Defendants shall submit the laboratory's QA/QC program to EPA for approval. The Settling Defendants shall include detailed information to demonstrate that the laboratory is qualified to conduct the work, including information on personnel qualifications, equipment, and material specifications. The Settling Defendants shall provide assurances that EPA has access to laboratory personnel, equipment, and records for sample collection, transportation, and analysis activities.

c. Health and Safety Plan (HSP)

The Settling Defendants shall prepare a Health and Safety Plan (HSP) that conforms with the Settling Defendants' Health and Safety program, and that complies with Occupational and Safety & Health Act (OSHA) regulations and protocols. The Settling Defendants shall prepare the HSP to include elements such as a

health and safety risk summary, a description of monitoring and personal protective equipment, medical monitoring, site control, and medical and emergency routes and contacts. In particular, the Settling Defendants shall ensure compliance of field activities with 29 CFR Section 1910.120.

2. UAU GROUND-WATER REMEDY MONITORING WELL INSTALLATION

The Settling Defendants shall install monitoring wells and collect and analyze field data to provide the information required to accomplish the objectives of the UAU ground-water remedy selected in the ROD. The monitoring well installation program includes the installation of monitoring wells and related apparatus that will allow the gathering of data (1) to refine the estimated extent of UAU contamination by VOCs above MCLs (shown approximately in Figure 6 of the ROD), (2) to estimate the mass of VOCs in the UAU, and (3) to estimate the mass flux of VOCs leaving the UAU. Monitoring well installation activities shall be performed by the Settling Defendants in accordance with this SOW, the FSP and the QAPP.

Within two hundred (200) days of the effective date of the Consent Decree, or within one hundred eighty (180) days of EPA approval of the FSP and QAPP, whichever is later, the Settling Defendants shall complete installation, including aquifer testing, of twenty-five (25) new UAU monitoring wells and four (4) new MAU wells at the locations indicated approximately in Figure B.11, attached hereto, and described more specifically in Table B.11, also attached hereto. For purposes of this SOW, these 25 new UAU monitoring wells and four new MAU monitoring wells shall be considered the Phase I monitoring wells. Also for purposes of this SOW, Area A shall be the area shown approximately in Figure 20 of the ROD extending from approximately Oak Street to Indian School Road and from approximately Scottsdale Road to Miller Road, Area B shall be the area shown approximately in Figure 20 of the ROD extending from approximately Oak Street to 1/4 mile north of Thomas Road and from approximately 1/4 mile west of Hayden Road to Pima Road, and Area C shall be the area shown approximately in Figure 20 of the ROD extending from approximately McKellips Road to 1/4 mile north of McDowell Road and from approximately 1/4 mile west of Scottsdale Road to Granite Reef Road. As indicated in Figure B.11 and Table B.11, the Settling Defendants shall install four (4) new UAU monitoring wells in Area A, five (5) new UAU monitoring wells in Area B, and sixteen (16) new UAU and four (4) new MAU monitoring wells in Area C. For purposes of access, the Settling Defendants may adjust the final Phase I monitoring well locations within a one hundred (100) foot radius of the locations described in Table B.11.

Except as otherwise provided in this SOW, the Settling Defendants shall construct the new UAU monitoring wells required

as part of the UAU ground-water remedy using a driven casing/casing advancement drilling method that will effectively prevent sloughing of borehole walls during well installation. The Settling Defendants may advance the boreholes for the new MAU wells at locations C-6, C-7, C-13 and C-16 with the air/mud-rotary method, in which case the Settling Defendants shall run geophysical logs in these MAU boreholes. After using the geophysical logs from the MAU boreholes at locations C-6, C-7, C-13 and C-16 to identify the UAU/MAU contact, the Settling Defendants also may advance the UAU boreholes for the new UAU monitoring wells at these locations using the air/mud-rotary method. The Settling Defendants also may advance the boreholes for the new UAU monitoring wells at locations C-1 and C-14 using the air/mud-rotary method. The Settling Defendants shall advance the boreholes for the new UAU monitoring wells to approximately 5 feet below the UAU/MAU contact and place slotted casing from the UAU/MAU contact up to 20 feet above the static water level at the time of drilling. Provided, however, if the water level at a particular location is below the UAU/MAU contact at the time of UAU monitoring well installation, the Settling Defendants shall place slotted casing from the UAU/MAU contact to 20 feet above the UAU/MAU contact. The Settling Defendants shall advance the boreholes for the new MAU monitoring wells to 300 feet below land surface and place slotted casing from 250 to 300 feet below land surface. Provided, however, if the Settling Defendants are unable to place 50 feet of slotted casing from 250 to 300 feet below land surface within the MAU because a 50 foot interval in the MAU is not available above 300 feet below land surface at that location, the Settling Defendants shall place at that location at least 20 feet of slotted casing, centered within the MAU as identified from the geophysical log for the borehole at that location.

During advancement of the borehole for each UAU or MAU monitoring well, a geologist for the Settling Defendants shall prepare lithologic descriptions of materials derived from not greater than 5-foot depth increments and also from formation changes. The lithologic descriptions shall include detailed observations of sample color, size distribution (Wentworth Scale), angularity-roundness, sorting, and minerals visible in the coarse fraction.

The Settling Defendants shall complete each borehole as a single-completion ground-water monitoring well similar to those presently in existence at NIBW. The Settling Defendants shall complete the intervals described above with four-inch diameter, blank and slotted steel casing. The Settling Defendants may surround the slotted interval with a sand or gravel pack at the approval of EPA. After completion, the Settling Defendants shall conduct single-well, constant discharge (12-hour pumping/12-hour recovery) aquifer tests on each well to allow estimates of transmissivity in the vicinity of each well. The Settling

Defendants shall conduct the aquifer tests in a manner consistent with previous aquifer testing at NIBW in monitoring wells.

The Settling Defendants shall notify EPA in writing, with a copy to the State, at least two weeks in advance of the planned dates for field activities related to monitoring well installation.

The Settling Defendants shall document consistently and record adequately information gathered during well installation in well-maintained field logbooks and laboratory reports. The Settling Defendants shall document in the field logbooks observations, measurements, and significant events that occur during well installation activities. The methods of documentation shall be specified by the Settling Defendants in the FSP and the QAPP. In addition, the Settling Defendants shall establish a data security system to safeguard field books and other project records from loss, damage, or alteration.

Within two hundred ninety (290) days of the effective date of the Consent Decree, or within two hundred seventy (270) days of EPA approval of the FSP and QAPP, whichever is later, the Settling Defendants shall submit to EPA an "Area C Monitoring Well Installation Summary Report." The Settling Defendants shall include the following in the Area C Monitoring Well Installation Summary Report:

- 1) A summary of Area C monitoring well installation activities conducted under this SOW, and
- 2) A presentation of all data collected during the Area C monitoring well installations.

The Settling Defendants shall include as appendices to the report a summary of all validated data, detailed as-built well construction diagrams and geophysical logs, descriptions of cuttings, and any other information collected in connection with Area C monitoring well installation.

Within one hundred twenty (120) days of the effective date of the Consent Decree or within one hundred (100) days of EPA approval of the FSP and QAPP, whichever is later, the Settling Defendants shall submit for EPA approval, with a copy to the State, a Phase II Proposal for Additional Monitoring Wells in Areas A and B ("Phase II Proposal"). The Phase II Proposal shall recommend additional wells necessary to meet the objectives of the ROD for Areas A and B. The Phase II Proposal shall include all information, including validated laboratory analyses, upon which the proposal is based. In particular, the Phase II Proposal shall include the results from two sampling rounds for each of the Area A and Area B locations indicated in Figure B.11 and Table B.11. The Settling Defendants shall collect the first

sample from each such well no sooner than thirty (30) days after installation of that well, and shall collect the second sample no sooner than thirty (30) days after collecting the first sample. Provided, however, that a "post-completion" sample and the first 30-day sample may be sufficient with respect to a specific new monitoring well if so determined by EPA. Each of these sampling rounds also shall include water-level measurements at each new monitoring well in those areas. Upon approval by EPA, the Settling Defendants shall implement the Phase II Proposal for additional monitoring wells for Area A and Area B.

Within two hundred sixty (260) days of the effective date of the Consent Decree, or within two hundred forty (240) days of EPA approval of the FSP and QAPP, whichever is later, the Settling Defendants shall complete installation of the Phase II monitoring wells in Areas A and B, if required by EPA, at the locations approved by EPA.

If required by EPA, within three hundred fifty (350) days of the effective date of the Consent Decree, or within three hundred thirty (330) days of EPA approval of the FSP and QAPP, whichever is later, the Settling Defendants shall submit for EPA approval, with a copy to the State, a Phase III Proposal for Additional Monitoring Wells in Areas A and B ("Phase III Proposal"). The Phase III Proposal shall recommend additional wells necessary to meet the objectives of the ROD for Areas A and B. The Phase III Proposal shall include all information, including validated laboratory analyses, upon which the proposal is based. In particular, the Phase III Proposal shall include the results from two sampling rounds for each of the Phase II Area A and Area B monitoring well locations. The Settling Defendants shall collect the first sample from each such well no sooner than thirty (30) days after installation of that well, and shall collect the second sample no sooner than thirty (30) days after collecting the first sample. Provided, however, that a "post-completion" sample and the first 30-day sample may be sufficient with respect to a specific new monitoring well if so determined by EPA. Each of these sampling rounds also shall include water-level measurements at each new monitoring well in those areas. Upon approval by EPA, the Settling Defendants shall implement the Phase III Proposal for additional monitoring wells, if required by EPA, for Area A and Area B.

In the Phase III Proposal, the Settling Defendants also shall include for EPA approval the proposed schedules for implementation of Phase III monitoring well installation.

Within ninety (90) days of EPA's written determination that the Settling Defendants have completed all necessary phases of monitoring well installation for Area A under this SOW, the Settling Defendants shall submit to EPA, with a copy to the State, an "Area A Monitoring Well Installation Summary Report."

The Settling Defendants shall include the following in the Area A Monitoring Well Installation Summary Report:

- 1) A summary of Area A monitoring well installation activities conducted under this SOW, and
- 2) A presentation of all data collected during the Area A monitoring well installations.

The Settling Defendants shall include as appendices to the report a summary of all validated data, detailed as-built well construction diagrams, descriptions of cuttings, and any other information collected in connection with Area A monitoring well installation.

Likewise, within ninety (90) days of EPA's written determination that the Settling Defendants have completed all necessary phases of monitoring well installation for Area B under this SOW, the Settling Defendants shall submit for EPA approval, with a copy to the State, an "Area B Monitoring Well Installation Summary Report." The Settling Defendants shall include the following in the Area B Monitoring Well Installation Summary Report:

- 1) A summary of Area B monitoring well installation activities conducted under this SOW, and
- 2) A presentation of all data collected during the Area B monitoring well installations.

The Settling Defendants shall include as appendices to the report a summary of all validated data, detailed as-built well construction diagrams, descriptions of cuttings, and any other information collected in connection with Area B monitoring well installation.

3. UAU GROUND-WATER REMEDY WATER-QUALITY AND WATER-LEVEL MONITORING PROGRAM

In the UAU Ground-Water Remedy Water-Quality and Water-Level Monitoring Program ("Monitoring Program"), the Settling Defendants shall gather data (1) to refine the estimated extent of UAU contamination by VOCs above MCLs (shown approximately in Figure 6 of the ROD), (2) to estimate the mass of VOCs in the UAU, and (3) to estimate the mass flux of VOCs leaving the UAU. The Settling Defendants shall perform these activities in accordance with this SOW, the FSP and the QAPP.

For Phase I monitoring wells, the Settling Defendants shall collect and analyze water-quality samples on a quarterly basis for four consecutive quarters. The first quarter shall coincide with the first quarterly monitoring round under the Scottsdale

Operable Unit Consent Decree that commences after completion of the last Phase I monitoring well. After the fourth sampling round, the Settling Defendants shall collect and analyze samples semiannually (every six months). The Settling Defendants shall measure water levels at each Phase I monitoring well monthly for twelve (12) months, beginning with the first full calendar month following completion of the last Phase I monitoring well. Thereafter, the Settling Defendants shall measure water levels every two months.

The Settling Defendants also shall monitor water quality and water levels at no less than twenty-eight (28) existing UAU monitoring wells and well E-10MA. The Settling Defendants shall incorporate these existing monitoring wells into the Monitoring Program concurrent with the Phase I monitoring wells.

The Settling Defendants shall notify EPA in writing, with a copy to the State, at least two weeks in advance of the planned dates for any water-level measuring or water-quality sampling activities. At any time, the Settling Defendants may submit for EPA approval, with a copy to the State, a proposal, including a detailed justification, for a change in the frequency of water-level measurements or water-quality sampling at any location.

The Settling Defendants shall document consistently and record adequately information gathered during the Monitoring Program in well-maintained field logbooks and laboratory reports. The Defendants shall specify methods of documentation in the FSP or the QAPP. The Settling Defendants shall use field logbooks to document observations, measurements, and significant events that occur during field activities. The Settling Defendants shall use shipping and laboratory reports to document sample custody, analytical responsibility, analytical results, adherence to prescribed protocols, nonconformity events, corrective measures, and data deficiencies. In addition, the Defendants shall establish a data security system to safeguard chain-of-custody forms and other project records from loss, damage, or alteration.

The Defendants shall maintain field reports, sample shipment records, analytical results, and QA/QC reports to ensure that only validated analytical and water-level measurement data are reported to and used by EPA. Analytical results developed by the Settling Defendants under this SOW shall be accompanied by or cross-referenced to a corresponding QA/QC report.

4. ESTIMATES OF VOC MASS AND MASS FLUX

Within one hundred eighty (180) days of the effective date of the Consent Decree, the Settling Defendants shall submit for EPA approval, with a copy to the State, a proposed detailed procedure for estimating the VOC mass in the UAU and for estimating the mass flux of VOCs out of the UAU ("Estimate

Procedure"). In the Estimate Procedure, the Settling Defendants shall use (1) water-quality data, (2) water-level data, and (3) any other information relevant to the physical characteristics of the ground-water system. The Settling Defendants shall include a schedule (1) for estimating the VOC mass and mass flux, and (2) for reporting estimates of VOC mass and mass flux to EPA. The Settling Defendants shall implement the Estimate Procedure approved by EPA.

5. PERIODIC REVIEW FOR ATTAINMENT OF PERFORMANCE STANDARDS

When EPA has issued a written determination that the Settling Defendants have attained Performance Standards at each monitored location within the UAU for three consecutive years (Certification of Completion of the Joint Remedial Action), the Settling Defendants may begin "Periodic Review" to ensure that the Joint Remedial Action remains protective of human health and the environment. "Periodic Review" shall consist of monitoring of the wells in the UAU Monitoring Program at least biennially (every two years). If at any time biennial monitoring indicates that the Settling Defendants have not attained Performance Standards, the Settling Defendants shall resume semiannual monitoring, until Performance Standards once again are met for three consecutive years. In order for EPA to determine that the Joint Work has been completed, the Settling Defendants shall demonstrate the attainment of Performance Standards at each monitored location for at least three consecutive years of semiannual monitoring, followed by the attainment of Performance Standards at each monitored locations for at least five consecutive Periodic Review biennial monitoring rounds.

During Periodic Review, the Settling Defendants shall perform the Operation and Maintenance necessary such that the monitoring wells used as part of the Monitoring Program will continue to provide valid water-quality samples and water-level measurements.

6. REPORTING OF MONITORING RESULTS

In addition to any other reporting required under the Consent Decree, the Settling Defendants shall submit "UAU Ground-Water Monitoring Program Reports" or "UAU Ground-Water Periodic Review Reports" to EPA, with a copy to the State, (i) within fifteen (15) days of the end of the quarter in which the Settling Defendants collect quarterly, semiannual, or biennial water-quality samples, and (ii) within fifteen (15) days of the end of the month in which the Settling Defendants perform monthly or bimonthly water-level measurements. In the UAU Monitoring Program Reports and the Periodic Review Reports, the Settling Defendants shall include the results of water-level measurements or water-quality sampling analyses, as appropriate, and shall identify clearly the wells involved, the dates and times of

measurement or sampling for each well, unusual conditions at the time of monitoring, and any deviations from the FSP or QAPP approved by EPA. The Settling Defendants also shall include a detailed description of any activities performed, or planned prior to the next scheduled monitoring activities, to maintain the monitoring wells, including, but not limited to, any re-drilling or re-casing activities, equipment repair and equipment replacement, if any such activities are performed or planned to be performed.



TABLE B.11

SUMMARY OF LOCATIONS FOR PHASE I MONITOR WELLS,
UPPER ALLUVIUM UNIT REMEDY

<u>AREA A</u>	<u>LOCATION</u>
A-2	UAU monitor well located on west side of Scottsdale Road at Second Street
A-3	UAU monitor well located on west side of Hinton Avenue, 800 feet north from Osborn Road
A-4	UAU monitor well located on north side of Osborn Road, 650 feet east from Scottsdale Road
A-8	UAU monitor well located at SRP well 22.3E, 7N
<u>AREA B</u>	<u>LOCATION</u>
B-4	UAU monitor well located on west side of Hayden Road, 1,400 feet south from Thomas Road
B-5	UAU monitor well located on north side of Thomas Road, 1,000 feet east from Hayden Road
B-6	UAU monitor well located 600 feet north from Oak Street, 1,000 feet west from Granite Reef Road
B-8	UAU monitor well located 300 feet south from Thomas Road, 500 feet east from Granite Reef Road
B-9	UAU monitor well located on west side of Pima Road, 400 feet north from Thomas Road
<u>AREA C</u>	<u>LOCATION</u>
C-1	UAU monitor well located at site of monitor well pairs PA-19LA / PA-20MA
C-2	UAU monitor well located 700 feet north from McDowell Road, 1,500 feet east from Scottsdale Road
C-3	UAU monitor well located 1,000 feet north from McDowell Road, 400 feet east from Miller Road
C-5	UAU monitor well located on east side of 77th Street, 750 feet south from McDowell Road



<u>AREA C</u>	<u>LOCATION</u>
C-6	UAU and MAU monitor wells located on Belleview Street, 100 feet west from Scottsdale Road
C-7	UAU and MAU monitor wells located 650 feet north from Roosevelt Street, 1,200 feet east from Scottsdale Road
C-8	UAU monitor well located on west side of Miller Road, 1,000 feet north from Roosevelt Street
C-9	UAU monitor well located on Continental Drive, 200 feet west from Scottsdale Road
C-10	UAU monitor well located 250 feet south from Roosevelt Street, 1,000 feet east from Scottsdale Road
C-11	UAU monitor well located at SRP well 22.5E, 5.5N
C-12	UAU monitor well located 700 feet south from Roosevelt Street, 1,300 feet east from Hayden Road
C-13	UAU and MAU monitor wells located 1,200 feet north from McKellips Road, 300 feet east from Scottsdale Road
C-14	UAU monitor well located at site of monitor well pairs PA-15LA / PA-16MA
C-15	UAU monitor well located 1,300 feet north from McKellips Road, 100 feet east from Miller Road
C-16	UAU and MAU monitor wells located 200 feet south from McKellips Road, 1,250 feet east from Scottsdale Road
C-17	UAU monitor well located 100 feet south from McKellips Road, 600 feet east from Miller Road



